

Title:

****The People of the Philippines vs. Ernesto Puno y Filomeno: A Case of Insanity Defense in Murder****

Facts:

Ernesto Puno, a 28-year-old jeepney driver, committed an act of murder on September 8, 1970, around two o'clock in the afternoon. He entered the bedroom of 72-year-old Francisca Col, widely known as Aling Kikay, in Little Baguio, Barrio Tinajeros, Malabon, Rizal, and brutally killed her using a hammer. Witnesses to the act included Hilaria de la Cruz and Lina Pajes, who were present in the vicinity at the time. Post the murder, Puno threatened the witnesses not to inform the police, after which he fled.

The police were informed about the murder by Una (a bystander or another witness), and corporal Daniel B. Cruz confirmed the murder upon arrival at the scene. Puno was eventually surrendered to the police by his father and was subsequently taken for psychiatric evaluation. He was indicted for murder, with the aggravating circumstances of evident premeditation, abuse of superiority, and disregard of the victim's sex stipulated in the charge.

Puno defended himself by claiming amnesia regarding the murder event and presented a belief in witchcraft as part of his defense, arguing that he was compelled to kill due to his belief in the victim's involvement in witchcraft. Despite presenting witnesses to testify regarding his erratic behavior and supposed belief in witchcraft, the defense of insanity was heavily countered by the reports of three psychiatric experts who asserted that Puno acted with discernment during the commission of the murder.

Issues:

1. Whether the defense of insanity is tenable in absolving Puno from the murder of Aling Kikay.
2. The applicability and evaluation of aggravating circumstances in the commission of the murder.

Court's Decision:

The Supreme Court of the Philippines, after a detailed review of the case, concluded that Puno was not legally insane at the time of committing the murder. It was established that his mental illness did not render him completely deprived of discernment or the ability to distinguish right from wrong.

Although Puno suffered from schizophrenia, the evidence and psychiatric reports confirmed that he possessed discernment during the murder. Consequently, his defense of insanity was rejected. Moreover, the Court modified the trial court's decision by setting aside the death penalty and convicting Puno to reclusion perpetua, taking into consideration the mitigating circumstances of voluntary surrender and his mental condition.

Doctrine:

The Supreme Court reiterated the doctrine that for insanity to be considered a valid defense, it must be proven that the accused was completely deprived of intelligence, discernment, and freedom of will at the time of committing the crime. A mere abnormality of the mental faculties does not exempt one from liability.

Class Notes:

- Insanity as a Defense: Requires clear evidence showing that the accused was completely deprived of discernment or the ability to discern right from wrong at the time of committing the crime.
- Aggravating Circumstances: Abuse of superiority was upheld, while evident premeditation and disregard of the victim's sex as aggravating circumstances were not satisfactorily proven.
- Mitigating Circumstances: The Court considered Puno's mental illness (schizophrenic reaction) as a mitigating circumstance, despite not sufficient for an insanity defense, and his voluntary surrender to the authorities.

Historical Background:

This case highlights the Philippine legal system's stringent requirements for the defense of insanity, underscoring the necessity for clear, unequivocal evidence of complete lack of discernment or intelligence in committing a crime. It underscores the Court's commitment to a balanced assessment, considering both the gravity of the crime and the mental state of the accused, within the bounds of law and psychiatric evaluation.